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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

ALLEN MORSLEY,
petitioner

*

CASE # 1:01-cv-01003

V.

*

Kame

DONALD ROMINE,
respondent

*

*

FILED
HARRISBURG, PA

FEB 25 2002

MARY E. D'ANDREA, CLERK
Per *[Signature]* Deputy Clerk

MOTION TO FILE INSTANT SUPPLEMENTAL
AMENDMENT TO HABEAS PETITION
PURSUANT TO RULE 15 FED. OF C.P.

NOW COMES , the petitioner Allen Morsley , Herein pro se,
hereby respectfully moving this Hon. Court to Allow petitioner
to file this "Supplemental Amendment" To Habeas petition ,
pursuant to rule 15 (a) (d) Of Federal rules of Civil procedure,
And in the Interest of Justice ' To raise the (2) Two Following
Constitutional , And Jurisdictional Grounds For Relief.

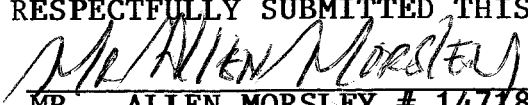
The grounds Are As Follow :

1. That Current Federal Sentence/Conviction Defectively "enhance"
Based upon "un-counseled" prior Convictions. SEE AFFIDAVIT
FILED ON OR ABOUT FEB , 5th 2002.
2. That the petitioner was Denied "Effective" Assistance of counsel
During Trial and Sentencing in Current Case . Because Petitioner
Counsel Failed To investigate Wether petitioner Received Assistance
of Counsel During Petitioners Prior Convictions. SEE AFFIDAVIT
FILED ON OR ABOUT FEB , 5th 2002.

The Petitioner Also prays that this Court Allows petitioner to Include UNITED STATES Vs. VAZQUEZ, 271 F3d. 93, 96, (3rd Cir 2001) (en banc). As petitioner Averss that this Case Brings Clearer One of Main Arguments that Has Been Argued in the Instant Case.

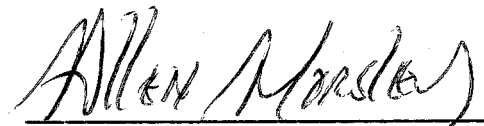
" Historically , [the grand jury] has " Been regarded as a primary security to the innocent against hasty , malicious and oppressive prosecution; it serves the invaluable function in our society of standing between the accuser and the accused to determine whether a charge is founded upon reason or was dictated by an intimidating power or malice and personal ill will." WOOD V. GEORGIA, 370 U.S. 375, 390, 82 S.Ct. 1364, 1373, 8 LEd. 2d 569 (1962).

Wherefore petitioner Prays that this Hon. Court Allows Motion To Supplement And Amend ' So that Petitioners Case Might be The Case That is Needed To See the Injustice that has Been overlooked.

RESPECTFULLY SUBMITTED THIS DAY FEB. 15, 2002

MR. ALLEN MORSLEY # 14718056

CERTIFICATE OF SERVICE

I , ALLEN MORSLEY , THE PETITIONER IN THIS CASE 1:01-cv-01003
HEREBY CERTIFY UNDER THE PENALTYS OF PERJURY , THAT I HAVE SERVED
COPY OF , MOTION TO FILE INSTANT SUPPLEMENTAL AMENDMENT TO HABEAS
PETITION , BY MAIL TO THE FOLLOWING , PLACING POSTAGE PAID ENVELOPE
IN POSTBOX , ADRESSED TO MATHEW E. HAGGERTY. ASS. U.S ATTORNEY.
OF THIS DO I AFFIX MY HAND THIS DAY FEB, 15, 2002

A handwritten signature in cursive script that reads "Allen Morsley". The signature is written in dark ink and is positioned above a horizontal line.

ALLEN MORSLEY # 14718056